UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

JOHN LAING,

Plaintiff,

v.

BP, P.L.C.; BP EXPLORATION & PRODUCTION, INC.; BP PRODUCTS NORTH AMERICA, INC.; BP AMERICA, INC.,

Defendants.

CASE NO. 4:14-cv-02386-LHR

JOINT NOTICE OF SETTLEMENT & MOTION FOR CONTINUANCE

Plaintiff John Laing and Defendants BP p.l.c., BP Exploration & Production Inc., BP Products North America Inc., and BP America Inc. (collectively, "Defendants"), file this Notice of Settlement pursuant to Local Rule 16.3 and the Court's Procedures and respectfully state as follows:

- 1. The deadline to submit the parties' joint discovery/case management plan in this matter is September 16, 2014. The Initial Pretrial and Scheduling Conference is set for September 26, 2014 at 10:00 a.m.
- 2. Plaintiff and Defendants have reached a settlement agreement that will resolve all claims that have been asserted in this case.
- 3. The parties are in the process of finalizing their settlement agreement and will submit a stipulation of dismissal and proposed agreed final judgment to the Court within thirty days of this Notice pursuant to the Court's Procedures.

4. Accordingly, the parties seek a thirty-day continuance of this matter, its associated deadlines, and the initial pre-trial conference, to allow time for the parties to finish finalizing the settlement agreement and drafting the accompanying motion for dismissal.

Dated: September 16, 2014

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing instrument has been served by electronic CM/ECF filing, on this 16th day of September, 2014 to all counsel of record.

/s/ Thomas W. Taylor
Thomas W. Taylor